

**AFFIDAVIT OF TASK FORCE OFFICER MICHAEL SULLIVAN
IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Michael Sullivan, having been first duly sworn, do hereby depose and state as follows:

INTRODUCTION

1. I am employed as a Sergeant Detective with the City of Boston (Massachusetts) Police Department. I am also a sworn Special Deputy United States Marshal. I have been employed by the Boston Police Department since October 2005 and am currently assigned as a Task Force Officer to the Federal Bureau of Investigation (“FBI”) Boston Division, Child Exploitation and Human Trafficking Task Force. While employed by the Boston Police Department, I have investigated state and federal criminal violations related to, among other things, the online sexual exploitation of children. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media.

2. As part of my duties, I am authorized to investigate violations of the laws of the United States, including criminal violations relating to child exploitation, child pornography, coercion and enticement, and transportation of minors, including but not limited to violations of 18 U.S.C. §§ 2422, 2423, 2251, and 2252A.

3. I submit this affidavit in support of a criminal complaint charging Beau Christopher Benson (“BENSON”) (YOB 1988), of Dorchester, Massachusetts, with one count of receipt of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A), and one count of possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).

4. The statements contained in this affidavit are based in part on information directly or indirectly received, from other law enforcement agents, witnesses, and agencies; information

gathered from the service of subpoenas and search warrants; and my experience, training, and background as a Task Force Officer with the FBI and a Police Officer with the Boston Police Department. Because this affidavit is submitted for the limited purpose of establishing probable cause to secure a criminal complaint, I have not included each and every fact known to me concerning this investigation. Where statements of others are set forth in this affidavit, they are set forth in substance and in part, unless otherwise noted.

STATEMENT OF PROBABLE CAUSE

Information from CW-1

5. On April 10, 2023, CW-1 was interviewed in Boston, Massachusetts in the presence of his attorney.¹ CW-1 provided information about observations CW-1 made while in the presence of BENSON.

6. CW-1 indicated that he knew Beau BENSON personally and said that prior to meeting BENSON, he had encountered BENSON in Zoom rooms that were used for the streaming of child pornography. CW-1 recalled Benson's Zoom username as "Bamshablam."

7. CW-1 recalled that child pornography would be streamed in these Zoom rooms and the users were able to make contact with each other and branch off into smaller rooms which would allow them to communicate more intimately. CW-1 reported that he first met BENSON in one of these smaller Zoom rooms.

8. CW-1 was unable to recall if BENSON streamed child pornography in the Zoom rooms, as the streaming may have been done by other participants in the Zoom rooms. CW-1 said he was unaware how long BENSON had been into child pornography, but CW-1 said BENSON

¹ CW-1 had previously pleaded guilty to federal child pornography charges and was awaiting sentencing on his case.

knew people that were participating in the Zoom rooms.

Information From Dropbox

9. On July 27, 2023, members of the Boston Police Department received National Center for Missing and Exploited Children² (NCMEC) cybertip #166065534. The cybertip was reported to NCMEC by Dropbox, a cloud storage provider. The cybertip reported that a user, identified in part by the user name “Beau Benson” and with an email address that contains BENSON’s name, had uploaded two files that Dropbox identified as child pornography. I know from my training and experience, in this context, uploaded means saved. Dropbox also reported that the user’s email address had been “verified”³ on October 9, 2020.

10. I have viewed the files reported by Dropbox to NCMEC and summarize them as follows:⁴

² NCMEC’s CyberTipline is the national online clearinghouse for tips and leads about child sexual exploitation. The CyberTipline is the method through which the public and electronic service providers may report the enticement of children for sexual acts, extra-familial child sexual molestation, child pornography, child sex tourism, child sex trafficking, unsolicited obscene materials sent to a child, misleading domain names, and misleading words or digital images on the internet.

Pursuant to 18 U.S.C. § 2258A, electronic service providers must report the facts and circumstances of apparent violations of certain federal statutes related to child exploitation, including § 2252A, that are committed with or through the use of their services. 18 U.S.C. § 2258A(1)(a). Those reports must be made to the CyberTipline and must include information related to the identity of the individual who appears to have committed the violations, information related to the geographic location of the individual, information regarding the transmission and discovery of the reported content, and copies of apparent child pornography related to the reported incident. *Id.* § 2258A(1)(b).

³ According to Google support, verification involves a user receiving a code at the email address and responding to Google with that code. *See* <https://support.google.com/accounts/answer/63950?hl=en> (last visited November 17, 2023)

⁴ The imagery described here and throughout the affidavit is available for review at the Court’s request.

a. A 21-second video file uploaded to the user's account on July 10, 2023 displays an adult penis inserted into the anus of a toddler that appears, based on his size, to be approximately two to four years old.

b. A one minute and ten second video, also uploaded to the user's account on July 10, 2023, displays an adult penis inserted into the anus of a toddler that appears, based on his size, to be approximately two to four years old.

11. NCMEC has a service by which law enforcement may upload hash values to determine if the child or children have been identified. Using that feature, I was able to determine that the child in the two files had been identified. I ⁵

12. According to the cybertip, Dropbox also provided NCMEC with several IP addresses that had been used to access the account. Among these, Dropbox reported that the user accessed the account at least twice on July 10, 2023 from IP address 2600:4040:5249:2600:a8e7:7b4d:d304:8a9b, which, according to records provided by Verizon, is subscribed to by a person who lives with BENSON at BENSON's Dorchester address.

Information from Federal Search Warrants

13. Based in part on the foregoing information, law enforcement obtained federal warrants to search BENSON's residence and person. *See* 23-mj-1372 and -1373-DLC. Law enforcement executed the warrants on August 3, 2023. At that time, an audio recorded interview of BENSON was conducted. BENSON was advised of his Miranda warnings prior to the interview and agreed to speak with law enforcement. During this interview, BENSON reported: (1) living at the residence; (2) that his email address was the one associated with the Dropbox account

⁵ Based on NCMEC definitions, an identified child means that exact hash values are associated with an image/video which appears to depict at least one child previously identified by law enforcement.

referenced above; and (3) that his internet service provider was Verizon FIOS.

14. During the interview, BENSON also confirmed that he had a Dropbox account which was associated with his email address. BENSON also said that a few weeks prior, he had received an email from Dropbox that his account had been deactivated. BENSON further said BENSON had someone living with him briefly and that person had asked if he could transfer files. BENSON claimed that he allowed this person to use BENSON's Dropbox account. BENSON indicated that Dropbox reported to him that BENSON had illegal pornographic content. BENSON denied having anything to do with child pornography found in his Dropbox account.

15. During the interview, BENSON was asked if he had ever seen child pornography. BENSON explained that there are Zoom rooms where people are playing child pornography but he would immediately leave the room upon observing that material being played. BENSON admitted that he used Dropbox to save homemade adult pornographic videos.

16. On October 20, 2023, I obtained a federal warrant authorizing the search of the Dropbox account associated with BENSON's email address for evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography). *See* 23-mj-7412-JCB.

17. I have reviewed the material that Dropbox provided pursuant to the warrant, which includes approximately 15 videos files that I believe, for the reasons detailed below, depict child pornography. A sampling of these files is described as follows:

- a. Filename⁶ "301058350\File Data\Dropbox Folder\TOSHIBA EXT.dbx-

⁶ I know from using Zoom myself that Zoom's default filename for recorded sessions is in the following format: YYYY-MM-DD HH.MM.SS [Provided First Name of Host] Personal Meeting Room [Meeting Room #]. I note that the file described in Paragraph 17.a. includes the phrase "B B's Personal Meeting Room" and the files described in Paragraphs 17.b., 17.c., 17.d., and 17.e. include the phrase "Shablame Phorme's" meeting room. B B may refer to "Beau

external-drive\Other\2020-05-24 01.44.23 B B's Personal Meeting Room 6426682802”⁷ is approximately 6 minutes and 22 seconds in duration. The video appears to be a screen recording of a Zoom video conference or similar platform. The video displays several men in different frames, including BENSON, all of whom are masturbating. Also visible in a separate frame is a video collage that depicts, in part, an adult male masturbating over the vagina of a small female child who appears to be either an infant or a toddler. My opinion of the age of the young child is based on the size and appearance of the child as compared to the adult male depicted and her body shape, size, and distribution of body fat, which I believe to be consistent with that of, at most, a toddler. It appears that the penis ejaculates onto the child. A new video starts and displays an adult penis being inserted into the anus of a prepubescent female child who appears to be approximately five to seven years old. While these child pornography videos play in one frame, the men displayed in the other frames, including BENSON, continue to masturbate. My opinion of the age of the child is based on the size and appearance of the child as compared to the adult male depicted and the absence of secondary sexual characteristics, such as pubic hair or breast development.

b. Filename “301058350\File Data\Dropbox Folder\TOSHIBA EXT.dbx-external-drive\Other\2020-06-03 13.00.16 Shablame Phorme's Personal Meeting Room 9331604151”⁸ is approximately 17 minutes and five seconds in duration. This video

Benson;” I note the similarity between “Shablame” and the description given by CW-1 (“Bamshablam”).

⁷ I have reviewed the metadata associated with this video file, which includes a “created” date of 05/24/2020 at 2:20 AM. This is consistent with the name of the file.

⁸ I have reviewed the metadata associated with this video file, which includes a “created” date of 06/30/2020 1:22 PM. This is consistent with the name of the file.

appears to be from a Zoom video conference or similar platform, that displays two men in separate frames, one of whom is BENSON. A video is played in a separate frame during the Zoom video conference which appears to be video collage. The video plays while BENSON masturbates and is talking with the other adult male participant in the video. BENSON is heard saying, among other things, “I want to see you fucking rape a little girl with your cock,” “Just making out with you while my niece⁹ turns blue,” and “suffocating her with our dicks.” The child pornography video that plays during the video conference begins with a boy, who appears to be approximately 10-12 years old, with an adult penis inserted into his mouth. My opinion of the age of the 10- to 12-year-old child described above is based on the size and appearance of the child as compared to the adult male depicted and the boy’s lack of secondary sexual characteristics, such a pubic hair. The video transitions to displaying an adult man and infant boy with the adult man placing the infant boy’s penis into his mouth. The male then presses his penis against the mouth of the infant boy and then appears to force his penis into the boy’s mouth. The video continues with the male rubbing his penis against the child’s buttocks and then returns to the adult male placing his penis into the child’s mouth. My opinion of the age of the infant described above is based on the size and appearance of the infant as compared to the adult male depicted; and the infant’s body shape, size and distribution of body fat which I believe to be consistent with that of an infant.

c. Filename *“file-data-part-1sullivan\301058350\File Data\Dropbox
Folder\TOSHIBA EXT.dbx-external-drive\Other\2020-06-05 15.20.11 Shablame*

⁹ I am aware that BENSON does, in fact, have a five-year-old niece.

Phorme's Personal Meeting Room 7016388080”¹⁰ is approximately 10 minutes and 39 seconds in duration. The video begins with three men, one of whom is BENSON, who appear to be in separate frames on a Zoom or similar platform. The three men are naked and appear to be masturbating while a video plays in a separate frame, depicting a prepubescent female who, based on her size and appearance, appears to be about seven to nine years old, who is on a bed with an adult man wearing a mask. The child is wearing a pink top but has no clothing on from her waist down. The male places the child on top of him while he lays on his back and appears to penetrate the child’s anus with his penis. (As the child pornography streams, BENSON is heard saying, “fuck, yeah,” and “fuck.”) The male then lays the child on a table as he continues to penetrate the child’s anus with his penis. The video transitions to the child standing up as the male places his penis against the child’s mouth and masturbates. The male places his penis in the child’s mouth. A new video is then started displaying a prepubescent child who, based on the child’s size and appearance appears to be about five to seven years old, wearing just a shirt, as an adult male appears to penetrate the child’s anus with his penis. I was unable to determine the gender of this child, as the child’s genitals were not visible in the video.

d. Filename “301058350\File Data\Dropbox Folder\Home\2021-12-24 21.01.23 Shablame Phorme's Personal Meeting Room”¹¹ is approximately nine minutes and 27 seconds in duration. The video appears to be from a Zoom conference or similar platform, and displays two men masturbating in separate frames, one of whom is

¹⁰ I have reviewed the metadata associated with this video file, which indicates a “created” date of 06/05/2020 at 3:34 PM. This is consistent with the name of the file.

¹¹ I have reviewed the metadata associated with this video file, which includes a “created” date of 12/24/2021 at 9:15 PM. This is consistent with the name of the file.

BENSON, as various videos are streamed in another frame during the video conference. Part of this video appears to display a prepubescent female with an adult penis inserted into her anus as someone manipulates her vagina with their finger. During the video, BENSON is no longer visible, but can be heard directing the other participant to scroll through various video thumbnails visible in the streaming frame, which appear to be child sexual abuse material. Another video begins streaming, displaying a prepubescent female with an adult penis inserted into her anus. As the video begins, BENSON is heard saying, “I don’t think I’ve ever seen this one before, this looks hot though.”¹² The video starts with a clothed prepubescent child who, based on his size and appearance, appears to be about five to seven years old, apparently asleep. The male adult in the video begins to undress the child down to his underwear. The male then pulls down the child’s underwear exposing the boy’s penis. The child moves and the male touches the boy’s penis with his hand. **I selected this video, which contains child pornography and which Beau Christopher BENSON receives and saves to his personal Dropbox account on December 24th, 2021, for the receipt charge.**

e. Filename “301058350\File Data\Dropbox Folder\TOSHIBA EXT.dbx-external-drive\2020-10-21 20.29.19 Shablame Phorme's RingCentral Meeting 1482385944”¹³ is approximately 11 minutes and 1 second in duration. The video appears to be from a Zoom video conference or similar platform. It displays one man masturbating

¹² I am not able to determine from my review of these videos which user was streaming the child pornography to the other room participants. Based on this comment and the fact that BENSON was directing the other user to browse through the available child pornography videos, however, it appears that BENSON was *not* the source of the streaming videos on this date.

¹³ I have reviewed the metadata associated with this video file, which includes a “created” date of 10/21/2020 at 8:53 PM. This is consistent with the name of the file.

in one frame as various videos are streamed in another frame during the video conference. Visible in the streaming frame is a video showing a prepubescent female child who appears to be approximately seven to nine years old wearing a masquerade-style mask while an adult penis is in her mouth. The child is then placed on her back as a device is inserted into her anus. The video continues with an adult male anally penetrating a boy, who appears to be about 12 to 14 years old. Toward the end of the recording, BENSON can be seen in his frame displaying his cellular phone to the other participant as BENSON begins to masturbate.

18. The above-described videos of the recorded Zoom rooms varied in how the different participants were displayed. At times, the videos had various numbers of separate frames displayed in the videos (i.e., BENSON masturbating, another individual masturbating, and streaming child pornography). At other times, only BENSON's frame was seen on screen, while at other times the other participant is observed on the screen. I am aware that the view setting (i.e., whether frames are tiled as equal sizes or whether a certain frame is spotlighted/displayed larger than others) may be adjusted by the host or by individual members of a room.

19. According to Zoom support,¹⁴ Zoom meetings are not recorded unless the user takes steps to record them. According to Dropbox, users can take steps to save their Zoom conferences to their Dropbox account by enabling the Zoom app in Dropbox settings.¹⁵ Based on all of this, I submit that BENSON knowingly and intentionally saved recordings of the above-described Zoom rooms to his Dropbox account, knowing that they contained child pornography.

CONCLUSION

¹⁴ See, e.g., https://support.zoom.com/hc/en/article?id=zm_kb&sysparm_article=KB0067954 (last accessed November 20, 2023).

¹⁵ See <https://help.dropbox.com/integrations/zoom> (last accessed November 20, 2023).

20. Based on all of the foregoing, I submit that there is probable cause to believe the following:

a. On or about December 24, 2021 [*see* paragraph 17, subsection d], Beau Christopher BENSON knowingly received child pornography, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2)(A). Specifically, Beau Christopher BENSON received child pornography on that date by knowingly and intentionally participating in a Zoom session in which he knew child pornography would be shown by another participant in the Zoom session, and thereafter saving the Zoom session with child pornography onto his personal Dropbox account.

b. On or about July 10, 2023 (the date on which BENSON uploaded the two files described in paragraphs 9 and 10 to his Dropbox account, which also on that date, contained various child pornography files as described in paragraph 17), Beau Christopher BENSON knowingly possessed material that contained videos of child pornography that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B).

Sworn to under the pains and penalties of perjury,

Michael Sullivan ^{DLC}
Task Force Officer Michael Sullivan
Federal Bureau of Investigation

SWORN before me telephonically pursuant to Fed. R. Crim. P. 4.1 this 21 day of November, 2023.



HONORABLE DONALD L. CABELL
CHIEF UNITED STATES MAGISTRATE JUDGE

